

**EXHIBIT "C"**

**AFFIDAVIT OF ROBERT WRIGHT**

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

AFFIDAVIT OF ROBERT WRIGHT

1.

My name is ROBERT WRIGHT. I am over the age of eighteen years, and I am fully competent to give the testimony set forth herein. I have personal knowledge of the facts stated herein and know them to be true.

2.

I have been a staff member at various churches of Scientology for 20 years. Since 2009, I have been a staff member of Church of Scientology International in Los Angeles. My position is International Construction Supervisor. My responsibilities include oversight of the acquisition and renovation of buildings that house Scientology churches anywhere in the world.

3.

CSI is the ecclesiastical head of the Church, and is responsible for setting the strategy and strategic programs for the Scientology religion.

4.

Based on my study of CSI's files and my general knowledge of my position, I am informed and believe that beginning in 2003, CSI embarked on a program to create what we call Ideal Central Organizations or "Ideal Orgs." (For decades, Scientology churches have been referred to colloquially as "Orgs," short for organizations.) An Ideal Class V Organization holds and houses all of the functions required for a Class V Church, according to the Scientology Scriptures, and is able to actually deliver all of those functions and services. Even many today, an estimated 90% or more) of our existing Church buildings are not of the correct size to house all the functions. For that reason, for the last five (5) or six (6) years, Scientology churches around the world have been purchasing new buildings so that they can provide all the needed programs and functions of the church.

5.

There are thousands of pages of Policy Letters and Bulletins that Mr. Hubbard wrote that describe how Scientology Churches should be organized and how they should function. These include the Organizing Board.

6.

Each local Scientology church, such as Plaintiff, must have sufficient facilities to provide the full range of training and auditing for each gradient level on the Bridge, except for certain higher levels of spiritual advancement available only at more advanced Scientology churches.

7.

In 2003, CSI determined that from that point forward, all future Scientology churches would be designed and built as Ideal Church Organizations. At first, there were no standards in place. We were trying out different concepts and evolving those concepts as we went along. The first pilot Ideal Church was in Tampa.

8.

The physical space needs of the Church are dictated by the nature of Scientology and its religious beliefs and practices, as set forth in its Scriptures.

9.

Over the course of the next four years, the whole program along with all standards and requirements was developed. These standards and requirements have become fixed for at least the last two years, during the time I have been working in this

area. In terms of overall size, the absolute bare minimum is 40,000 square feet. In terms of space planning, the range of 50-65,000 square feet is easier to work with.

10.

There are approximately 130 Class V Churches in the world. One of these is the Church of Scientology of Georgia. This is currently the only Class V Church in Georgia. It is expected that as part of its function as an Ideal Org., it will open up new missions and new groups that will eventually grow to become new Class V Churches.

11.

Each Class V Church is organized in accordance with an Organizing Board, which is uniform for all such churches around the world. See Exhibit 12 to Deposition of Robert Wright.

12.

The Organizing Board was developed by L. Ron Hubbard and the policies which describe it are part of the Scientology Scriptures. All of the main functions represented on this Organizing Board are planned for in the space planning for an Ideal Org building. Indeed, it is essential that all of these functions are included in the planning of an Ideal Org building.

A Church cannot be considered Ideal if any of these functions are omitted.

13.

The designs of the Ideal Class V Churches are prepared by the architectural firm Gensler under the supervision of CSI's Senior Designer. There are standards that have to be met for the functional design of a Class V Church. The Chart correlates the functions as described on the Organizing Board with the layout of the rooms needed to house these functions.

14.

The plans and designs for each room in an Ideal Church are based on Scientology Scripture. Different course rooms need to be planned differently due to the different ways these courses are structured.

15.

Most courses are divided into Theory and Practical sections. The Theory course room is arranged for study at tables, with CD playing equipment for tapes, and larger tables for demonstrating principles using clay models. The Practical course rooms do not have CD equipment or clay tables, and so

have a different arrangement. Some course rooms are set up for training drills that do not require any tables.

16.

Many course rooms relate to one another, such that as many as five (5) course rooms may be utilized by the students of one class, who migrate from room to room at their own pace during a study period; thus, not all course rooms will be used at any one time, and all course rooms will certainly not be at full capacity within any one time period.

17.

Therefore, for planning purposes, a Theory course room for a specific course needs to be located next to the Practical course room for that same course and the film room needs to be near all course rooms so that the students can easily see religious instructional films.

18.

Auditing must be provided in quiet and confidential surroundings, away from other activities that may be going on in a church.

19.

Auditing is supervised by a trained "Case Supervisor," who must first be trained as an auditor. The Case Supervisor's role is to see that the auditing is ministered in a correct orthodox manner.

20.

The standard for an Auditing room is the culmination of many different policy letters of our Founder.

21.

Scientology churches also hold congregational services on Sundays, religious holidays, and certain other occasions.

22.

Scientology churches are mandated to include large Public Display areas, including audio-visual presentations on the religion and its social betterment campaigns such as for human rights, drug and alcohol addiction prevention, literacy and scholastic improvement.

23.

In order to provide Scientology Training courses, Scientology Auditing and case supervision, Scientology dissemination materials and displays, and church administration,

Scientology churches must meet space requirements to house these activities.

24.

In accordance with the procedures that CSI has promulgated, any Class V Church that wishes to purchase a new building fills out a checklist covering various points, which is submitted to CSI's Building Investment Committee for approval. The Atlanta Church submitted a checklist for the building located at 5395 Roswell Road, Sandy Springs, Georgia in 2004.

25.

The Roswell Road building without the basement is approximately 32,000 square feet. With the basement it is just under 44,000 square feet, which would just qualify for an Ideal Church Organization.

26.

While there are many ways one can organize the facilities in a given building, a building of less than 40,000 square feet will not provide adequate space for the essential services and activities, as found from space planning nearly a hundred Churches of Scientology. (Certain Scientology Churches, designated as Celebrity Centers, do not require the same amount

of public displays as other Scientology Churches, and accordingly their space requirements are somewhat less.)

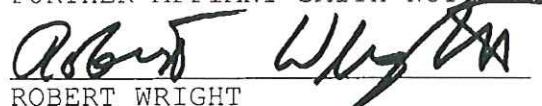
27.

All of the newest Church of Scientology buildings around the world are fully and properly set up to minister all services of Scientology.

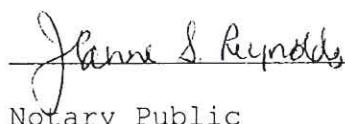
28.

A crucial function of the individuals who approve the purchase of new prospective church buildings is to consider how a potential Ideal Org building will be able to be renovated to fit all of the essential religious services and activities in a manner that is pursuant to religious scripture.

FURTHER AFFIANT SAITH NOT

  
ROBERT WRIGHT

Sworn to and subscribed  
before me this 12<sup>th</sup>  
day of December, 2010.

  
Jeanne S. Reynolds  
Notary Public

My Commission Expires:

